

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
:
PADDOCK ENTERPRISES, LLC : Case No. 20-10028 (LSS)
:
Debtor.¹ :
:
----- X -----

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MAY 16, 2022 AT 10:00 A.M. (ET)**

This hearing will be conducted in-person. Anyone participating in-person must be fully vaccinated for Covid-19.

Parties wanting to participate remotely should register with the Zoom link below no later than May 16, 2022 at 8:00 a.m. (ET)

<https://debuscourts.zoomgov.com/meeting/register/vJlscOuopz4vHhF7cYqqRPA3KbO3bzus-b0>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

I. CONFIRMATION:

1. Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. 1286 – filed April 1, 2022]

Confirmation Objection / Response Deadline: May 5, 2022 at 4:00 p.m. (ET)

Confirmation Objections / Responses Received:

- A. United States Trustee’s Objection to the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code (D.I. 1286) [Docket No. 1347 – filed May 5, 2022] (the “U.S. Trustee Objection”)

¹ The last four digits of the Debtor’s federal tax identification number are 0822. The Debtor’s mailing address is One Michael Owens Way, Perrysburg, Ohio 43551.

² **Amended items appear in bold.**

B. Informal Comments from GlaxoSmithKline and Block Drug

Cure Objection/Response Deadline: April 14, 2022, at 4:00 p.m. (ET) (for executory contracts and unexpired leases included in Exhibit F to the Notice of Filing of Plan Supplement for the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. 1295]) and May 2, 2022 at 4:00 p.m. (ET) (only with respect to executory contracts and unexpired leases added to the Supplemental Notice to Certain Contract and Lease Counterparties [Docket No. 1314])

Cure Objections / Responses Received:

A. Informal comments from BWAY Corporation

Related Documents:

- i. Order (I) Approving Disclosure Statement and Form and Manner of Notice of Hearing Thereon; (II) Establishing Solicitation Procedures; (III) Approving Forms of Ballots; (IV) Approving Form, Manner, and Scope of Confirmation Notices; (V) Establishing Certain Deadlines in Connection with Approval of Disclosure Statement and Confirmation of Plan; and (VI) Granting Related Relief [Docket No. [1216](#) – filed February 17, 2022]
- ii. First Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1219](#) – filed February 17, 2022]
- iii. Disclosure Statement for First Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1220](#) – filed February 17, 2022]
- iv. Notice of Hearing to Consider Confirmation of First Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1221](#) – filed February 17, 2021]
- v. Notice of Filing of Blacklines of Plan [Docket No. [1288](#) – filed April 1, 2022]
- vi. Notice of Filing of Plan Supplement for the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1295](#) – filed April 1, 2022]

- vii. Supplemental Notice to Certain Contract and Lease Counterparties [Docket No. [1314](#) – filed April 18, 2022]
- viii. Notice of Filing of Amended Plan Supplement for the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1315](#) – filed April 18, 2022]
- ix. Declaration of Jeanne C. Finegan, APR Regarding Plan Noticing Program [Docket No. [1322](#) – filed April 21, 2022]
- x. Notice of Filing of Revised Schedules and Exhibits to Plan [Docket No. [1330](#) – filed April 22, 2022]
- xi. Declaration of James Daloia of Kroll Restructuring Administration LLC in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1331](#) – filed April 25, 2022]
- xii. Debtor’s (A) Memorandum of Law in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code and (B) Reply to the UST Objection to Confirmation of the Plan [Docket No. [1355](#) – filed May 11, 2022]
- xiii. Declaration of David J. Gordon in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1356](#) – filed May 11, 2022]
- xiv. Declaration of Tony Simion in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1357](#) – filed May 11, 2022]
- xv. Declaration of Randolph L. Burns in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1358](#) – filed May 11, 2022]
- xvi. Declaration of James L. Patton, Jr. in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1362](#) – filed May 11, 2022]
- xvii. **Notice of Filing of Proposed Confirmation Order [Docket No. [1368](#) – filed May 12, 2022]**
- xviii. **Declaration of Thomas Vasquez, Ph.D. in Support of Confirmation of the Second Amended Plan of Reorganization for Paddock Enterprises, LLC Under Chapter 11 of the Bankruptcy Code [Docket No. [1369](#) – filed May 13, 2022]**

Witness Information:

- a. The Debtor intends to offer the live testimony of David J. Gordon, President and Chief Restructuring Officer of the Debtor
- b. The Legal Representative for Future Asbestos Claimants intends to offer the live testimony of James L. Patton, Jr., Legal Representative for Future Asbestos Claimants
- c. The Debtor may offer the testimony by declaration, proffer and/or live video testimony of Jeanne C. Finegan, APR, Managing Director and Head of Kroll Notice Media Solutions, who will appear from her home in Tigard, Oregon
- d. The Debtor may offer the testimony by declaration, proffer and/or live testimony of James Daloia, Senior Director of Restructuring Administration and Issuer Services of Kroll Restructuring Administration LLC
- e. The Debtor may offer the testimony by declaration, proffer and/or live testimony of Randolph L. Burns, Vice President, Global Government Affairs & Legal Legacy Strategy of O-I Glass, Inc.
- f. The Debtor may offer the testimony by declaration, proffer and/or live testimony of Tony Simion, Managing Director of Alvarez & Marsal
- g. **The Legal Representative for Future Asbestos Claimants may offer the testimony by declaration, proffer and/or live testimony of Thomas Vasquez, Ph.D., Senior Managing Director of Ankura Consulting Group, LLC**
- h. The parties reserve the right to offer the testimony of additional witnesses, as necessary, by declaration, proffer, and/or live testimony

Status: The hearing to consider confirmation of the Debtor's proposed plan is going forward. The informal comments from GlaxoSmithKline and Block Drug and BWAY Corporation have been resolved.

II. INTERIM FEE APPLICATIONS:

2. Interim Fee Applications

Objection / Responses Received: (See Exhibit A)

Related Documents: (also, See Exhibit A)

- i. Certification of Counsel Regarding Eighth Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Docket No. 1319 – filed April 20, 2022]

Status: On April 20, 2022, the Debtor submitted a proposed omnibus order under certification of counsel regarding the interim fee applications listed on Exhibit A attached hereto. Accordingly, a hearing on this matter is only necessary to the extent the Court has questions or concerns.

Dated: May 13, 2022
Wilmington, Delaware

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